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Attorneys for Plaintiffs,
Carol Peterson and Douglas Peterson

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

	:	
Carol Peterson and Douglas Peterson,	:	
Plaintiffs,	:	Civil Case No.:
vs.	:	
Admin Recovery, LLC.,	:	
Defendant.	:	
	:	

VERIFIED COMPLAINT

Plaintiffs, Carol Peterson and Douglas Peterson (Plaintiffs), through their attorneys, The Law Offices of Jennifer M. Kurtz, LLC, alleges the following against Defendant, Admin Recovery, LLC. (Defendant):

INTRODUCTION

1. Count I of Plaintiffs' Complaint is based on the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. 1692, *et seq.*

PARTIES

2. Plaintiffs are each natural persons residing at 140 S. Feltus St. South Amboy, New

Jersey 08879.

3. Defendant is a national debt collection corporation with a business office located in Clarence, New York.
4. Plaintiffs are each consumers as that term is defined by 15 U.S.C. 1692a(3), and according to Defendant, Plaintiffs allegedly owe a debt as that term is defined by 15 U.S.C. 1692a(5).
5. Defendant is a debt collector as that term is defined by 15 U.S.C. 1692a(6), and sought to collect a consumer debt from Plaintiffs.
6. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

JURISDICTION AND VENUE

7. Jurisdiction of this court arises pursuant to 15 U.S.C. 1692k(d), which states that such actions may be brought and heard before “any appropriate United States district court without regard to the amount in controversy.”
8. Defendant conducts business in the State of New Jersey, and therefore, personal jurisdiction is established.
9. Venue is proper pursuant to 28 U.S.C. 1391(b)(2).

FACTUAL ALLEGATIONS

10. In or around November of 2012, Defendant placed collection calls to Plaintiffs seeking and demanding payment for an alleged consumer debt.
11. Plaintiffs’ alleged debt owed arises from transactions for personal, family, and household purposes.

12. Defendant called Plaintiffs' telephone number at 732-721-90XX.
13. In or around November of 2012, Defendant called Plaintiffs and left a voicemail message on Plaintiffs' answering machine. *See* transcribed voicemail message attached hereto as Exhibit A.
14. In the voicemail message, Defendant's representative, "Ray" failed to meaningfully disclose the nature of the call or state that the call was from a debt collector. *See* Exhibit A.
15. In the voicemail message, Defendant's representative, "Ray", directed Plaintiffs to call him back at 1-866-703-7961, extension 218 and reference file number 273461, which is a number that belongs to Defendant. *See* Exhibit A.
16. Defendant is using false, deceptive and misleading means in connection with attempting to collect a debt by not identifying the purpose of its phone calls or that they are an attempt to collect a debt.

COUNT I
DEFENDANT VIOLATED THE FAIR DEBT COLLECTION PRACTICES ACT

17. Defendant violated the FDCPA based on the following:
 - a. Defendant violated §1692e of the FDCPA by using false, deceptive or misleading representation with the collection of the debt.
 - b. Defendant violated §1692e(10) of the FDCPA by using deceptive means in an attempt to collect a debt.
 - c. Defendant violated §1692e(11) of the FDCPA by failing to disclose that the call was from a debt collector.

Wherefore, Plaintiffs, Carol Peterson and Douglas Peterson, respectfully requests judgment be entered against

Defendant, Admin Recovery, LLC. for the following:

18. Statutory damages of \$1,000.00 pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k.
19. Costs and reasonable attorneys' fees pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. 1692k.
20. Any other relief that this Honorable Court deems appropriate.

CERTIFICATION PURSUANT TO LOCAL RULE 11.2

Pursuant to Local Rule 11.2, I certify that this matter in controversy is not the subject of any other action pending in any court, arbitration, or administrative proceeding.

DATED: February 14, 2013

The Law Offices of Jennifer M. Kurtz, LLC

By: /s/ Jennifer M. Kurtz

Jennifer M. Kurtz
Attorney for Plaintiffs,
Carol Peterson and Douglas Peterson